

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
	:	
NADIRE ATAS,	:	
	:	
Plaintiff,	:	
	:	1:22-cv-00853-JPO
- against -	:	
	:	
THE NEW YORK TIMES COMPANY, <i>et al.</i> ,	:	
	:	
Defendants.	:	
	:	
_____	X	

DECLARATION OF DAVID E. MCCRAW

I, David E. McCraw, hereby declare under penalty of perjury as follows:

1. I am Senior Vice President & Deputy General Counsel at The New York Times Company (“The Times”). I make this declaration upon personal knowledge, a review of public records, and a review of the corporate records of The Times kept in the regular course of business.
2. Attached as **Exhibit A** is a true and correct copy of a judgment entered January 28, 2021 in *Caplan v. Atas*, 2021 O.N.S.C. 670 (Can.). The judgment is publicly available at: <https://canlii.ca/t/jewcm>.
3. Attached as **Exhibit B** is a true and correct copy of the Affidavit of Christine Perri, dated September 23, 2014, filed with the Ontario Superior Court in the matter *People’s Trust Company, et al. v. Nadire Atas, et al.*, CV-14-515899 (Ontario Super. Ct.), together with exhibits attached to that affidavit.
4. Attached as **Exhibit C** is a copy of Ontario public criminal records concerning plaintiff

Nadire Atas.

5. Attached as **Exhibit D** is a true and correct copy of an article that is the subject of the First Cause of Action in Plaintiff's Third Amended Complaint: Kashmir Hill, *A Vast Web of Vengeance*, N.Y. Times (January 30, 2021) (the "January Article"). The January Article remains available on The New York Times website at:

<https://www.nytimes.com/2021/01/30/technology/change-my-google-results.html>.

6. Attached as **Exhibit E** is a true and correct copy of an article that is the subject of the Second Cause of Action in Plaintiff's Third Amended Complaint: Kashmir Hill, *Woman Accused of Defaming Dozens Online is Arrested*, N.Y. Times (February 10, 2021) (the "February Article"). The February Article remains available on The New York Times website at: <https://www.nytimes.com/2021/02/10/technology/nadire-atas-arrest.html>.

7. Attached as **Exhibit F** is a true and correct copy of an article referenced and relied on in Plaintiff's Third Amended Complaint: Kashmir Hill and Aaron Krolik, *The Slander Industry*, N.Y. Times (April 24, 2021) (the "April 24 Article"). The April 24 Article remains available on The New York Times website at:

<https://www.nytimes.com/interactive/2021/04/24/technology/online-slander-websites.html>.

Dated: New York, NY
January 27, 2023

Respectfully submitted,

/s/David E. McCraw

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